

FILED

16 MAY 17 PM 4:00

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD PURNELL,

Defendant.

) INDICTMENT

) CASE NO.

) Title 18, United States Code,  
) Sections 1591(a)(1) and  
) (b)(2)

1:16 CR 162

JUDGE ADAMS

COUNT 1

The Grand Jury charges:

1. From in or about October 2015, and continuing to on or about May 6, 2016, in the Northern District of Ohio, Eastern Division, defendant RICHARD PURNELL, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit, by any means, in and affecting interstate and foreign commerce, a person, namely Victim #1, knowing and in reckless disregard of the fact that Victim #1 had not attained the age of 18 years and that

Victim #1 would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(2).

A TRUE BILL.

Original Document - - Signatures on file with the Clerk of Courts, pursuant to E-Government Act of 2002.